

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH BONGIOVANNI,

Defendant.

Case No. 1:19-cr-227  
(LJV)

February 29, 2024

TRANSCRIPT EXCERPT - EXAMINATION OF A.A. (P.W. #8)  
BEFORE THE HONORABLE LAWRENCE J. VILARDO  
UNITED STATES DISTRICT JUDGE

APPEARANCES:

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And

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\* \* \* \* \*

(Excerpt commenced at 9:52 a.m.)

(Jury seated at 9:52 a.m.)

**THE COURT:** The government can call its next witness.

**MR. DICKSON:** Thank you, Judge. The government calls  
Autumn Asher.

**A. A. (PROTECTED WITNESS #8),** having been duly called and  
sworn, testified as follows:

**MR. DICKSON:** Can I proceed, Judge?

**THE COURT:** You may.

**DIRECT EXAMINATION BY MR. DICKSON:**

Q. Good morning.

A. Good morning.

Q. Will you please introduce yourself to the jury?

A. My name is A.A.

Q. Ms. A.A., do you live in the Buffalo area?

09:54AM 1 A. Yes, I do.

09:54AM 2 Q. How old were you when you first came to Buffalo?

09:54AM 3 A. I was 17.

09:54AM 4 Q. And have you lived here ever since?

09:54AM 5 A. Yes, I have.

09:54AM 6 Q. How old are you now?

09:54AM 7 A. 36.

09:54AM 8 Q. How far did you go in school?

09:54AM 9 A. I completed -- I completed my 11th grade year.

09:54AM 10 Q. Your 11th grade year?

09:54AM 11 A. Yeah.

09:54AM 12 Q. And after you completed your 11th grade year, did you

09:54AM 13 start working?

09:54AM 14 A. Yes, I did.

09:54AM 15 Q. What kind of jobs did you have?

09:54AM 16 A. I worked at fast food restaurants, and I worked in

09:54AM 17 retail. And then I was an exotic dancer, and I also did

09:54AM 18 collections.

09:54AM 19 Q. You said you were an exotic dancer. Were you ever an

09:54AM 20 exotic dancer at a place called Pharaoh's Gentlemen's Club?

09:54AM 21 A. Yes, I was.

09:54AM 22 Q. When did you start working there?

09:54AM 23 A. In the year of 2012.

09:54AM 24 Q. And when did you leave Pharaoh's?

09:55AM 25 A. 2018.

09:55AM 1 Q. Can you describe for the jury what the layout of  
09:55AM 2 Pharaoh's is like if you were walking in to Pharaoh's as a  
09:55AM 3 customer?

09:55AM 4 A. When you walk in, you walk in the door, you turn right  
09:55AM 5 and you look up, you see the bar, there's a side pole. And  
09:55AM 6 you scan the room around, there's the VIP rooms. And then  
09:55AM 7 there's a whole big stage. And there's tables and chairs.

09:55AM 8 Q. Now, is Pharaoh's just one level, or is there an  
09:55AM 9 upstairs, too?

09:55AM 10 A. There's an upstairs.

09:55AM 11 Q. Can you tell the jury how you decided to start working at  
09:55AM 12 Pharaoh's?

09:55AM 13 A. One of my friends had told me that they were making good  
09:55AM 14 money over there, and that I should come over and work there.

09:55AM 15 Q. And as a dancer there, how did you actually make money?

09:55AM 16 A. Made money by doing lap dances and VIP, tips on the  
09:55AM 17 stage, tips from customers.

09:56AM 18 Q. Did you ever have to give some of that money back to the  
09:56AM 19 managers of the club?

09:56AM 20 A. Yes.

09:56AM 21 Q. Can you tell the jury about that?

09:56AM 22 A. If you weren't there at noon, you got your first dance  
09:56AM 23 taken from you.

09:56AM 24 Q. What does that mean, to have your first dance taken from  
09:56AM 25 you?

09:56AM 1 A. For lap dances, you don't get a chip for it. They keep  
09:56AM 2 your chip.

09:56AM 3 Q. And tell them, tell the jury what a chip means.

09:56AM 4 A. The chip is your dance chip, and that's how we get our  
09:56AM 5 money at the end of the night. We turn those in to the VIP  
09:56AM 6 guy.

09:56AM 7 Q. So you get a chip for every dance, and then you turn  
09:56AM 8 those chips in at the end of the night?

09:56AM 9 A. Yes.

09:56AM 10 Q. Now, were there different shifts for working at  
09:56AM 11 Pharaoh's?

09:56AM 12 A. Yes, there was.

09:56AM 13 Q. What were those shifts?

09:56AM 14 A. There was the afternoon, the day shift, and then there  
09:56AM 15 was the night shift.

09:56AM 16 Q. Were there different managers for the day shift and for  
09:56AM 17 the night shift?

09:56AM 18 A. Yes, there was.

09:56AM 19 Q. Do you remember who the managers were while you worked  
09:57AM 20 there for the day shift?

09:57AM 21 A. The day shift, it was Chris.

09:57AM 22 Q. And then what about for the night?

09:57AM 23 A. Night shift, it was Doug.

09:57AM 24 Q. While you worked at Pharaoh's, Ms. A.A., did you meet  
09:57AM 25 somebody named Peter Gerace?

25 | A. When I went upstairs, turned the corner, and it was a

09:58AM 1 dark hallway. There was a bathroom, and there was another  
09:58AM 2 room with the doors shut. And down the hallway was the dark  
09:58AM 3 room, and there was a chair and a TV.  
09:58AM 4 Q. And what happened when you got up there?  
09:58AM 5 A. When I got up there, I was told to sit down on the chair,  
09:58AM 6 so I did.  
09:58AM 7 Q. Who told you to sit down in the chair?  
09:58AM 8 A. Peter.  
09:58AM 9 Q. Okay. What happened after Peter told you to sit down in  
09:59AM 10 the chair?  
09:59AM 11 A. When I sat down in the chair, he had given me some  
09:59AM 12 cocaine to do off the card. He put it up my nose and said  
09:59AM 13 sniff. And I said okay.  
09:59AM 14 Q. And you said he gave you some cocaine to do off of the  
09:59AM 15 card. What do you mean by "off of the card?"  
09:59AM 16 A. Like, he put it in a bag, and it was on the card, and  
09:59AM 17 told me to sniff it up my nose.  
09:59AM 18 Q. So there was some cocaine in the bag, and then he put it  
09:59AM 19 onto the card?  
09:59AM 20 A. Yes.  
09:59AM 21 Q. Did Peter actually hold the card up to your nose?  
09:59AM 22 A. Yes, he did.  
09:59AM 23 Q. And do you need a tissue or some water? You can have  
09:59AM 24 those if you'd like.  
09:59AM 25 Prior to Peter Gerace giving you that cocaine, Ms. A.A.,

10:00AM 1 on that night, had you ever used cocaine before?

10:00AM 2 A. No.

10:00AM 3 Q. What made you decide to use that cocaine that Peter

10:00AM 4 Gerace gave you?

10:00AM 5 A. I thought it was okay, like, to keep my job. I was new.

10:00AM 6 I didn't know.

10:00AM 7 Q. On that day when Peter Gerace gave you that cocaine, was

10:00AM 8 there anybody else upstairs with you?

10:00AM 9 A. Yes.

10:00AM 10 Q. Who?

10:00AM 11 A. Marcus.

10:00AM 12 Q. Did you understand what Marcus's last name might be?

10:00AM 13 A. Black.

10:00AM 14 Q. Would you recognize a picture of Marcus if I showed it to  
10:00AM 15 you?

10:00AM 16 A. Yes.

10:00AM 17 **MR. DICKSON:** Jane, if I can show for the witness  
10:00AM 18 only Government Exhibit 485.

10:00AM 19 **BY MR. DICKSON:**

10:00AM 20 Q. Ms. A.A., do you see that on your screen okay?

10:01AM 21 A. Yes.

10:01AM 22 Q. Do you recognize the person in that photo?

10:01AM 23 A. Yes.

10:01AM 24 Q. Does it fairly and accurately depict Marcus Black as you  
10:01AM 25 knew him back then?

1 A. Yes.

2 **MR. DICKSON:** Your Honor, the government offers 485  
3 into evidence.

4 **MR. MacKAY:** No objection.

5 **THE COURT:** Received without objection.

6 **(GOV Exhibit 485 was received in evidence.)**

7 **MR. DICKSON:** Can we publish that to the jury,  
8 please? Thank you.

9 **BY MR. DICKSON:**

10 Q. Ms. A.A., over your time working at Pharaoh's, did you  
11 get to know Marcus Black well?

12 A. Yes.

13 Q. Was he at Pharaoh's frequently when Peter Gerace was  
14 there?

15 A. Yes.

16 Q. Did you see Peter Gerace and Marcus Black interacting  
17 with each other?

18 A. Yes, I did.

19 Q. From what you saw and observed, how would you describe  
20 their relationship?

21 A. That they were friendly. Very good friends, to my  
22 knowledge.

23 Q. Earlier you told us that Peter Gerace gave you cocaine in  
24 that upstairs area. Did you ever see Marcus Black with  
25 cocaine inside of Pharaoh's?

1	A. Yes.
---	---------

2 Q. Did you ever see Marcus Black sell or give cocaine to  
3 Peter Gerace?

4	A. Yes.
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5 | Q. Was it just one time, or was it more than one time?

6 A. It was more than one time.

7 Q. When you would see this happen, Ms. A.A., where inside of  
8 Pharaoh's would you see Marcus Black give Peter Gerace  
9 cocaine?

10 | A. In the hallway by the kitchen where there was no cameras.

11 Q. Like, no security cameras?

12 | A. No security cameras.

13 | Q. Did you ever see them exchanging cocaine and money?

14	A. Yes.
----	---------

15 Q. And where inside of Pharaoh's would you see them exchange  
16 cocaine and money?

17 A. Over by the wall, again, where there was no security  
18 cameras.

19           **MR. DICKSON:** We can take down this exhibit, please.

20 | Thank you.

21 BY MR. DICKSON:

22 Q. Ms. A.A., did you ever see any other Pharaoh's employees  
23 dealing cocaine inside of the club?

24 A. Can you refresh my memory, please?

25 Q. Yeah, sure. Do you remember testifying in front of the

1 grand jury?

2 A. Yes.

3 Q. And would seeing a copy of what you said inside the grand  
4 jury help you remember?

5 A. Yes.

6 **MR. DICKSON:** Your Honor, I'm holding what's marked  
7 as 3566A for identification. And just for everybody's  
8 reference, I'm on page 29, starting at line 6 and going  
9 through to the next page.

10 May I approach the witness?

11 **THE COURT:** You may.

12 **BY MR. DICKSON:**

13 Q. Ms. A.A., go ahead and read through that page and the  
14 next page, and then when you're finished reading, look up at  
15 me, okay?

16 All done?

17 A. Yeah.

18 **BY MR. DICKSON:**

19 Q. I've taken the exhibit back from you, Ms. A.A. Did that  
20 help you remember whether there were other Pharaoh's  
21 employees who sold cocaine?

22 A. Yes.

23 Q. Which other employees at Pharaoh's do you remember  
24 selling cocaine?

25 A. Yes.

10:06AM	1	Q. Which? Which of the employees?
10:06AM	2	A. Charm.
10:06AM	3	Q. Charm? Was that a person's name at the club that they
10:06AM	4	used?
10:06AM	5	A. Yes.
10:06AM	6	Q. Do you know that person's real name?
10:06AM	7	A. Jessica Leyland.
10:06AM	8	Q. Who did you see Jessica Leyland sell cocaine to?
10:06AM	9	A. Peter, some of the dancers.
10:06AM	10	Q. Was that also inside of Pharaoh's?
10:06AM	11	A. Yes.
10:06AM	12	Q. Do you know from what you remember where you saw Jessica
10:06AM	13	Leyland sell cocaine to Peter inside of the club?
10:06AM	14	A. The hallway where there's no cameras.
10:06AM	15	Q. That same hallway?
10:06AM	16	A. Yes.
10:06AM	17	Q. And was this just one time, or was it more than one time?
10:06AM	18	A. It was more than once.
10:06AM	19	Q. Ms. A.A., you told us that when Peter Gerace gave you
10:07AM	20	that cocaine upstairs, that was the first time you ever used
10:07AM	21	cocaine?
10:07AM	22	A. Yes.
10:07AM	23	Q. After that happened, did you start using cocaine more
10:07AM	24	regularly?
10:07AM	25	A. Yes.

10:07AM 1 Q. Were you using cocaine more regularly while you were  
10:07AM 2 inside of Pharaoh's?  
10:07AM 3 A. Yes.  
10:07AM 4 Q. Why did you use cocaine inside of Pharaoh's?  
10:07AM 5 A. Because it was given to me.  
10:07AM 6 Q. Did you also use cocaine inside of that upstairs area  
10:07AM 7 more than once?  
10:07AM 8 A. Yes.  
10:07AM 9 Q. With Peter Gerace?  
10:07AM 10 A. Yes.  
10:07AM 11 Q. When you were upstairs, who would give you that cocaine?  
10:07AM 12 A. Peter would.  
10:07AM 13 Q. You said the first time that you got cocaine from Peter  
10:07AM 14 Gerace was around 2012?  
10:07AM 15 A. Yes.  
10:07AM 16 Q. Do you remember when the last time was?  
10:07AM 17 A. Right before I left.  
10:07AM 18 Q. Which was when?  
10:07AM 19 A. 2018.  
10:08AM 20 Q. And was that also in the upstairs part of Pharaoh's?  
10:08AM 21 A. Yes.  
10:08AM 22 Q. Did you also use other drugs while you were working at  
10:08AM 23 Pharaoh's?  
10:08AM 24 A. Yes.  
10:08AM 25 Q. What drugs?

10:08AM 1 A. Adderall.

10:08AM 2 Q. Where would you get the Adderall that you used inside of

10:08AM 3 Pharaoh's?

10:08AM 4 A. From Marcus Black.

10:08AM 5 Q. Marcus Black?

10:08AM 6 Ms. A.A., are you still using cocaine today?

10:08AM 7 A. No, I'm not.

10:08AM 8 Q. Are you still using Adderall?

10:08AM 9 A. No, I'm not.

10:08AM 10 Q. Ms. A.A., did you also see other dancers inside of

10:08AM 11 Pharaoh's use cocaine?

10:08AM 12 A. Yes.

10:08AM 13 Q. Did you see other dancers inside of Pharaoh's use other

10:08AM 14 drugs, too?

10:08AM 15 A. Yes.

10:08AM 16 Q. Do you remember any specific other drugs that you saw

10:09AM 17 other dancers use?

10:09AM 18 A. I can recall heroin.

10:09AM 19 Q. Heroin?

10:09AM 20 A. Yes.

10:09AM 21 Q. I think earlier you mentioned one of the day shift

10:09AM 22 managers, his name was Chris, right?

10:09AM 23 A. Yes.

10:09AM 24 Q. Did you ever see Chris fire one of those dancers who was

10:09AM 25 using heroin?

10:09AM

1 A. Yes.

10:09AM

2 Q. What happened to that dancer after Chris fired her, from  
3 what you remember?

10:09AM

10:09AM

4 A. They would go back to Peter and talk with him, and they  
5 would get -- he would give them their job back.

10:09AM

10:09AM

6 Q. Ms. A.A., while you were working at Pharaoh's, did any of  
7 the customers ever introduce themselves as friends of Peter  
8 Gerace's?

10:09AM

10:09AM

9 A. Yes.

10:09AM

10:09AM

10 Q. I want to talk to you a little bit about those groups  
11 that would introduce themselves as his friend, okay?

10:09AM

10:09AM

12 A. Okay.

10:10AM

10:10AM

13 Q. Was there ever an incidence when people who said they  
14 were Mr. Gerace's friends asked you to get them cocaine  
15 inside of Pharaoh's?

10:10AM

10:10AM

16 A. Yes.

10:10AM

10:10AM

17 Q. When was the first time that happened? Do you remember

18 what year?

10:10AM

10:10AM

19 A. Right when I first probably started to work there.

10:10AM

20 Q. So around 2012?

10:10AM

21 A. Yes, sir.

10:10AM

22 Q. Can you describe what happened that first time  
23 Mr. Gerace's friends asked about getting cocaine at  
24 Pharaoh's?

10:10AM

10:10AM

25 A. They asked me if I could go get it for them. And I said

10:10AM 1 I'll go ask Peter.

10:10AM 2 Q. So what did you do?

10:10AM 3 A. I went over to Peter and asked him, and he told me to go

10:10AM 4 see Marcus.

10:10AM 5 Q. After he told -- after Peter told you to go see Marcus,

10:10AM 6 what did you do? What did you do?

10:10AM 7 A. What did I do? I went over to Marcus and told him.

10:11AM 8 Q. Did Marcus give you cocaine?

10:11AM 9 A. Yes.

10:11AM 10 Q. What did you -- what did you say to Marcus when you got

10:11AM 11 over there?

10:11AM 12 A. I told Marcus that Peter's friends wanted cocaine, and

10:11AM 13 that Peter told me I could go to you to get it.

10:11AM 14 Q. What did Marcus do after you told him that?

10:11AM 15 A. He went to the bathroom and then came back out and

10:11AM 16 brought it in a dollar bill, and gave it to me to go give it

10:11AM 17 to them.

10:11AM 18 Q. You said he brought it. What's the "it?"

10:11AM 19 A. He brought cocaine in the dollar bill, and gave it to me

10:11AM 20 to go give to Peter's friends.

10:11AM 21 Q. When you say in a dollar bill, was it like wrapped up

10:11AM 22 inside of a dollar bill?

10:11AM 23 A. Yes, it was wrapped up.

10:11AM 24 Q. What did you do with that cocaine after Marcus Black gave

10:11AM 25 it to you?

10:11AM 1 A. I went over to give it to Peter's friends.

10:11AM 2 Q. Did you actually give it to them?

10:11AM 3 A. Yes.

10:11AM 4 Q. Did you get anything in return for delivering the cocaine  
10:12AM 5 from Marcus Black to Peter Gerace's friends?

10:12AM 6 A. Yes.

10:12AM 7 Q. What?

10:12AM 8 A. I was given cocaine in a dollar bill.

10:12AM 9 Q. And who gave you that cocaine?

10:12AM 10 A. Marcus.

10:12AM 11 Q. How much cocaine did he give you?

10:12AM 12 A. It was enough -- it was enough.

10:12AM 13 Q. Enough just for you to use?

10:12AM 14 A. No, enough for me if I wanted to share it with a dancer  
10:12AM 15 friend or two.

10:12AM 16 Q. Beyond this one time, Ms. A.A., were there other times  
10:12AM 17 where that same group of friends would ask you to get cocaine  
10:12AM 18 for them inside of Pharaoh's?

10:12AM 19 A. Yes.

10:12AM 20 Q. Was it always the same group of people, or were there  
10:12AM 21 other people?

10:12AM 22 A. There was other people.

10:12AM 23 Q. And you said that first time that happened, you went over  
10:13AM 24 to Peter and asked him permission?

10:13AM 25 A. Yeah.

10:13AM 1 Q. Every time these friends would ask for cocaine, did you  
10:13AM 2 always go ask Peter Gerace for permission?

10:13AM 3 A. Yes, I did.

10:13AM 4 Q. Did you do that every single time, or was there a time  
10:13AM 5 where you stopped asking?

10:13AM 6 A. There was a time I stopped asking, because Peter told me  
10:13AM 7 that I didn't need to anymore.

10:13AM 8 Q. Ms. A.A., did Peter Gerace ever tell you how to behave  
10:13AM 9 when you would see his friends doing cocaine?

10:13AM 10 A. Yes.

10:13AM 11 Q. What did Peter Gerace tell you?

10:13AM 12 A. Told me to look the other way. Act discreetly. Act like  
10:13AM 13 nothing was going on.

10:13AM 14 Q. Did he tell you to not say anything?

10:13AM 15 A. Yes.

10:13AM 16 Q. Over the course of the time that you worked at Pharaoh's,  
10:14AM 17 how many times would you say you delivered cocaine from Peter  
10:14AM 18 or Marcus to a group of customers?

10:14AM 19 A. Like, seven or eight times.

10:14AM 20 Q. And while you worked at Pharaoh's, Ms. A.A., did you see  
10:14AM 21 any law enforcement officers inside of Pharaoh's?

10:14AM 22 A. I would only see them when they would come in the  
10:14AM 23 building, they would show their badge, and they were allowed  
10:14AM 24 to come in for free.

10:14AM 25 **MR. DICKSON:** Give me just one second, okay?

2 BY MR. DICKSON:

5	A. 23, 24.
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7 Your Honor, I don't have any more questions.

9       **MR. MacKAY:** Yes, thank you, Your Honor.

12 Q. Good morning, Ms. A.A.

14 Q. So my name is Parker MacKay.

16 | Q. I represent somebody named Joseph Bongiovanni.

20	A. Yes.
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25	A. Correct.
----	-------------

1 Q. Okay. They were the people, to the best of what you saw,  
2 who brought cocaine into the club?

3 A. Yes.

4 Q. Okay. And you said there were some occasions where you  
5 acted something like a go-between, between Mr. Gerace's  
6 friends and Marcus Black; do you recall that?

7 A. I'm sorry, what?

8 Q. You talked about some situations where it looks like you  
9 brought drugs back and forth between Mr. Black and some  
10 friends of Mr. Gerace's; is that correct?

11 A. Yes.

12 Q. Okay. But you said that only happened about seven or  
13 eight times that you can remember, correct?

14 A. Yes.

15 Q. So you worked there from 2012 to 2018, correct?

16 A. Correct.

17 Q. And, I mean, can we understand that to mean that happened  
18 maybe just a little over one time a year then?

19 A. Not --

20 Q. Well, let me ask it to you a different way. Did that  
21 happen all in kind of a short period of time?

22 A. No, it happened over the course of the years that I  
23 worked there.

24 Q. Okay. But given how many, did you work continuously at  
25 Pharaoh's from 2012 to 2018?

1 A. It was on and off that I did.

2 Q. Okay. Would it be fair to say then that these incidents  
3 we're talking about were sort of few and far between?

4 A. Few and far between? What do you -- I'm sorry.

5 Q. Was there a lot of time between when these incidents  
6 would happen?

7 A. Yes. They would happen quite frequently when they would  
8 come in.

9 Q. Now, you mentioned a woman named Charm, who you know to  
10 be Jessica Leyland; do you remember her?

11 A. Correct, yes.

12 Q. Okay. And I think you told us that at times she appeared  
13 to be dealing cocaine?

14 A. Yes.

15 Q. Okay. Did you ever see her exchange any money for  
16 cocaine? Or was it just handing cocaine over to somebody?

17 A. What from what I can recall I remember I seen her handing  
18 it. And I'm almost positive there was money involved, too.  
19 I don't really remember.

20 Q. Okay. You don't remember a lot from that time period?

21 A. No.

22 Q. Now is it fair to say, though, that Ms. Leyland, when she  
23 would do this, this was more frequently, I'm sorry, this was  
24 more towards the end of the time when you worked at  
25 Pharaoh's?

10:18AM 1 A. Correct.

10:18AM 2 Q. Okay. So going back to the beginning of the time you  
10:18AM 3 worked at Pharaoh's, you didn't really see her dealing at  
10:18AM 4 that time, did you?

10:18AM 5 A. No, I didn't.

10:18AM 6 Q. Okay. Now, you talked about these groups of friends that  
10:18AM 7 came in who appeared -- who you thought were friends of  
10:18AM 8 Mr. Gerace's; do you remember those people?

10:19AM 9 A. Correct.

10:19AM 10 Q. You don't remember who any of those folks were, correct?

10:19AM 11 A. I don't know, no.

10:19AM 12 Q. Okay. Were they white? Were they black? Were they  
10:19AM 13 Hispanic?

10:19AM 14 A. They were white. And they were different color mixes,  
10:19AM 15 races, white, black, Hispanic.

10:19AM 16 Q. So it appeared to be different people on different  
10:19AM 17 occasions?

10:19AM 18 A. Yes.

10:19AM 19 Q. Okay. And none of those folks were law enforcement  
10:19AM 20 folks, were they? That you can recall?

10:19AM 21 A. I don't -- I don't remember really. I don't. I just  
10:19AM 22 know that they were all together sometimes. I just know, I  
10:19AM 23 remember law enforcement showed their badge at the door so  
10:19AM 24 they could get in.

10:19AM 25 Q. Sure. And that's the only way you would know if somebody

1 was law enforcement if they showed a badge at the door,  
2 correct?

3 A. Yes, correct.

4 Q. And, you know, I would assume you were not right there at  
5 the door, so you wouldn't know what type of badge it was or  
6 anything like that, correct?

7 A. Not most of the time, no.

8 Q. Okay. But you were never directed by Mr. Gerace at any  
9 point in time, like, hey, these folks are law enforcement,  
10 take care of them; is that fair to say?

11 A. That's fair.

12 Q. Okay.

13 A. Yes.

14 Q. I'm just going to ask you one more question, Ms. A.A.

15 A. Okay.

16 Q. There's a gentleman at this table who is seated -- who is  
17 seated next to where I was seated. He's got a gray tie on.  
18 You've never seen him before in your life that you recall,  
19 correct?

20 A. I've never seen him. I don't know him. I don't recall  
21 him.

22 **MR. MacKAY:** Okay. Thank you very much, Ms. A.A.

23 **THE WITNESS:** You're welcome.

24 **THE COURT:** Any redirect?

25 **MR. DICKSON:** Yes, Judge.

**REDIRECT EXAMINATION BY MR. DICKSON:**

Q. Almost done, okay?

Ms. A.A., when you were working at Pharaoh's, did you see people using cocaine inside of the club frequently, or infrequently?

A. Frequently.

Q. Okay.

**MR. DICKSON:** Your Honor, I don't have any more questions. Thank you.

**THE COURT:** Mr. MacKay, anything more?

**MR. MacKAY:** No, Your Honor.

**THE COURT:** Okay. You can step down, ma'am. Thank you.

(Witness excused at 10:20 a.m.)

(Excerpt concluded at 10:20 a.m.)

\* \* \* \* \*

**CERTIFICATE OF REPORTER**

In accordance with 28, U.S.C., 753(b), I certify that these original notes are a true and correct record of proceedings in the United States District Court for the Western District of New York on February 29, 2024.

s/ Ann M. Sawyer  
Ann M. Sawyer, FCRR, RPR, CRR  
Official Court Reporter  
U.S.D.C., W.D.N.Y.

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**EXCERPT - EXAMINATION OF A.A. (PROTECTED WITNESS #8)**

**FEBRUARY 29, 2024**

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